

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

United States of America  
Roberto CENTENO-Zuniga  
Mexican National  
YOB 1969

Case No. 7:18mj 2419

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 26, 2018 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 United States Code § 841

defendant did knowingly and intentionally posses with the intent to distribute approximately 1.06 kilograms of cocaine a scheduled II controlled substance

21 United States Code § 952

did knowingly and intentionally import from the United Mexican states into the United States approximately 1.06 kilograms of cocaine a scheduled II controlled substance

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

  
Complainant's signature

Laurence Diamond, HSI-SA  
Printed name and title

Sworn to before me and signed in my presence.

Date: 11/27/2018 - B.O.Z.

  
Judge's signature

City and state: McAllen, Texas

Juan F. Alanis, U.S. Magistrate Judge  
Printed name and title

**Attachment "A"**

On November 26, 2018, Homeland Security Investigations (HSI), McAllen, Texas, was notified by US Customs and Border Protection (CBP) that Roberto CENTENO-Zuniga made entry into the United States via the Hidalgo Port of Entry in Hidalgo, Texas. CENTENO-Zuniga was the driver of a gray Jeep Cherokee displaying Texas license plates GVV4451. CENTENO-Zuniga was selected for a secondary inspection.

During secondary inspection CBP Officers discovered one package of suspected narcotics under the front passenger seat of the Jeep Cherokee. A CBP canine inspection of the package resulted in a positive alert to the odor of narcotics. A probe of the package revealed a white powdery substance that field tested positive for cocaine. The single brick was weighed on a CBP calibrated scale and resulted in a total weight of 1.06 kilograms.

HSI McAllen Special Agents and Task Force Officers responded to the Hidalgo Port of Entry to interview CENTENO-Zuniga. CENTENO-Zuniga was read the Miranda Warnings which he waived and voluntarily agreed to speak with Agents. CENTENO-Zuniga was interviewed post-Miranda and admitted culpability stating he knew he was transporting cocaine and expected to get paid \$700.00 USD to smuggle the narcotics into the United States.